



which time this request is being drafted). Petitioner's counsel will return to the office mid-morning on Monday, June 20, 2011.

5. Due to the absence of Petitioner's counsel during the vast majority of the seven-day window permitted under Local Rule 7.1(i), a three-day extension is requested, making the Reply brief due Friday, June 24, 2011.
6. No previous motion to extend the time to file this reply have been requested, although the Court has entertained and granted several prior extensions with regard to the brief on the merits in this case.
7. As no trial or evidentiary hearing have been set in this case, and there are no other deadlines pending, the three-day extension will not affect any other proceedings in this case.
8. Counsel for Respondent was contacted in connection with request and has stated that Respondent does not object to this request.

**Relief Requested**

Petitioner submits that she has established good cause as required by Fed. R. Civ. P. 6(b) for her request to extend her deadline to file her Reply in favor of her Motion for Leave to Expand the Record and Hold Evidentiary Hearing on Actual Innocence.. Accordingly, she respectfully requests that the Court grant her request and extend the deadline to Friday, June 24, 2011.

Respectfully Submitted,

s/Christine Cave

Christine Cave, OBA #19774

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MOORE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of June, 2011, I electronically transmitted the attached document to the Court Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Jared Looper

Diane Slayton

COUNSEL FOR DEFENDANT

s/Christine Cave

Christine Cave